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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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INNA GUDAVADZE, LIANA ZHMOTOVA and IYA  
PATARKATSISHVILI,

Plaintiffs,

v.

JOSEPH KAY (A/K/A JOSEPH KAKALASHVILI, A/K/A  
JOSEPH KEJ, A/K/A IOSEB KAKALASHVILI, A/K/A  
IOSEB KAKIASHVILI) AND EMANUEL ZELTSER,

Defendants.  
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08-civ-3363 (RJS)

FRCP 7.1  
DISCLOSURE  
STATEMENT

**DISCLOSURE STATEMENT UNDER FRCP 7.1**

Pursuant to Federal Rule of Civil Procedure 7.1 and to enable District Judges and  
Magistrate Judges of the Court to evaluate possible disqualification or recusal, the  
undersigned counsel for Plaintiffs states as follows:

All Plaintiffs are individuals and not corporate entities. As such, there are no disclosures required under Rule 7.1.

Dated: New York, New York  
April 4, 2008

Respectfully submitted,

DEBEVOISE & PLIMPTON LLP

By: /s/ Christopher K. Tahbaz  
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